

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICHAEL CONTI,

Plaintiff,

V.

CORPORATE SERVICES GROUP, INC.,  
and JAY LEON,

### Defendants.

CASE NO. C12-245RAJ

## VERDICT FORM

We, the jury, answer the questions that the court submitted as follows:

## QUESTION 1

Did CSG discriminate against Mr. Conti on the basis of race or national origin in violation of Washington law?

YES

2

NO

Please answer Question 2.

## QUESTION 2

Did CSG discriminate against Mr. Conti on the basis of race or national origin in violation of federal law?

VES

1

NO

If you answered “YES” to Question 2, please answer Question 3. If you answered “NO” to Question 2, please skip Question 3 and answer Question 4.

1 **QUESTION 3**

2 Would CSG have taken the adverse employment action or actions you found to be  
3 discriminatory in answering Question 2 even if Mr. Conti's race and national origin had  
4 played no role in CSG's decision to take the action or actions?

5 YES

6 NO

7 Please answer Question 4.

8 **QUESTION 4**

9 Did CSG discriminate against Mr. Conti on the basis of age in violation of  
10 Washington law?

11 YES

12 NO

13 Please answer Question 5.

14 **QUESTION 5**

15 Did CSG retaliate against Mr. Conti in violation of Washington law?

16 YES

17 NO

18 Please answer Question 6.

19 **QUESTION 6**

20 Did CSG retaliate against Mr. Conti in violation of federal law?

21 YES

22 NO

23 Please answer Question 7.

1 **QUESTION 7**

2 Did Jay Leon discriminate against Mr. Conti on the basis of race or national origin  
3 in violation of Washington law?

4 YES

5 NO

6 Please answer Question 8.

7 **QUESTION 8**

8 Did Jay Leon discriminate against Mr. Conti on the basis of race or national origin  
9 in violation of federal law?

10 YES

11 NO

12 If you answered "YES" to Question 8, please answer Question 9. If you answered "NO"  
13 to Question 8, please skip Question 9 and answer Question 10.

14 **QUESTION 9**

15 Would Jay Leon have taken the adverse employment action or actions you found  
16 to be discriminatory in answering Question 8 even if Mr. Conti's race and national origin  
17 had played no role in his decision to take the action or actions?

18 YES

19 NO

20 Please answer Question 10.

21 **QUESTION 10**

22 Did Jay Leon discriminate against Mr. Conti on the basis of age in violation of  
23 Washington law?

24 YES

25 NO

26 Please answer Question 11.

1 **QUESTION 11**

2 Did Jay Leon retaliate against Mr. Conti in violation of Washington law?

3 YES

4 NO

5 Please answer Question 12.

6 **QUESTION 12**

7 Did Jay Leon retaliate against Mr. Conti in violation of federal law?

8 YES

9 NO

10 If you answered "YES" to any of Questions 1-12, please answer Question 13. If you  
11 answered "NO" to all of Questions 1-2, 4-8, and 10-12, please do not answer any other  
12 questions; sign and date this form and notify that the court that you have reached a  
13 verdict.

14 **QUESTION 13**

15 Please write the amount of damages that you find Mr. Conti has proven were  
16 proximately caused by Defendants, minus any amount that Defendants have proven Mr.  
17 Conti could have avoided by mitigating his damages:

18 A. reasonable value of lost earnings and

19 fringe benefits through June 2012: \$ 20,160

20 B. emotional harm: \$ 170,625.12

21 Please answer Question 14.

1 **QUESTION 14**

2 If you found Jay Leon liable for any violation of the law (that is, if you answered  
3 "YES" to any of Questions 7-8 or 10-12) please write the amount of damages from the  
4 amount you entered in response to Question 13 that you find Mr. Conti has proven were  
5 proximately caused by Mr. Leon. If you did not find Jay Leon liable for any violation of  
6 law, please do not answer this question.

7 A. reasonable value of lost earnings and

8 fringe benefits through June 2012: \$ 0

9 B. emotional harm:

10 \$ 10,000

11 *Please sign and date this form, and notify the court that you have reached a verdict.*

12 Dated December 12, 2013

13   
14

15 Signature of Presiding Juror